

**IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF OHIO  
EASTERN DIVISION**

DEARREA KING,	:	Case No. 2:18-cv-1060
	:	
Plaintiff,	:	Chief Judge Sargus
	:	Chief Magistrate Judge Deavers
v.	:	
	:	
CITY OF COLUMBUS, et al.,	:	
	:	
Defendants.	:	

**THIRD-PARTY DEFENDANT JARONN COLLINS' RESPONSES TO  
DEFENDANT BRYAN MASON'S REQUESTS FOR ADMISSION**

Third-Party Defendant Jaronn Collins hereby responds to Defendant Bryan Mason's Requests for Admission to Jaronn Collins as follows. Mr. Collins is continuing his search for relevant information and documents. All of the responses contained herein are based upon the information and documents presently available to Mr. Collins at this time. Mr. Collins anticipates that further investigation may produce information and documents that may lead to additions or changes to the responses herein. Mr. Collins makes the following responses in good faith and reserves the right to supplement his answers and objections based upon any subsequently discovered information or documents.

Inadvertent production by Mr. Collins of information or documents protected from disclosure by the attorney-client privilege, the work-product doctrine, or any other privilege, shall not constitute a waiver of any privilege or ground for objection to the discovery, or to the use, of any such documents or information or any other documents or information.

### **GENERAL OBJECTIONS**

These general objections are expressly incorporated by reference into each of the individual responses below.

1. Mr. Collins objects to each request to the extent it attempts to impose obligations beyond those implied by the Ohio Rules of Civil Procedure.
2. Mr. Collins objects to each request to the extent it seeks information or documents protected from discovery by any privilege or reason for absolute or conditional exemptions from discovery available to Mr. Collins under applicable law, including, but not limited to, the attorney-client privilege and the work-product doctrine.
3. Mr. Collins objects to each request to the extent that it imposes a duty on Mr. Collins to obtain and provide Defendant with information or documents not presently in Mr. Collins' possession, custody, or control.
4. Mr. Collins objects to each request to the extent it is overly broad, unduly burdensome, or not reasonably calculated to lead to the discovery of admissible evidence.
5. Mr. Collins objects to each request to the extent it fails to include any temporal limitation or define a relevant time period.

### **RESPONSES TO REQUESTS FOR ADMISSION**

**Admission Request #1** Admit that Jaronn Collins did not see the September 14, 2016 police-involved shooting of Tyre King.

**Response #1** Deny

**Admission Request #2** Admit that Jaronn Collins was sixteen years old on September 14, 2016.

**Response #2** Admit

**Admission Request #3** Admit that in the matter of *In re J.C.*, Franklin C.P. No. 17-JU-5796, Jaronn Collins was found to be a delinquent minor by the Court of Common

Pleas for Franklin County, Ohio, and to have committed the September 14, 2016 robbery of Michael Ames.

**Response #3** Admit

**Admission Request #4** Admit that, on February 27, 2019, in the matter of *State of Ohio v. Jaronn D. Collins*, Franklin C.P. Case No. 18-CR-05-2271, Jaronn Collins was deemed by the Court of Common Pleas for Franklin County, Ohio, to be incompetent to stand trial due to his mental condition.

**Response #4** Admit

Respectfully submitted,

**/s/ Jonathan P. Misny**

James B. Hadden (0059315), Trial Attorney  
Jonathan P. Misny (0090673)  
Murray Murphy Moul + Basil LLP  
1114 Dublin Road  
Columbus, OH 43215  
Telephone: 614.488.0400  
Facsimile: 614.488.0401  
E-mail: hadden@mmmb.com  
misny@mmmb.com

*Counsel for Third-Party Defendant Jaronn Collins*

**CERTIFICATE OF SERVICE**

The undersigned hereby certifies that a true and accurate copy of the foregoing  
was served this 11th day of September, 2019 via electronic mail upon the following:

Andrew D.M. Miller  
Timothy J. Mangan  
Westley M. Phillips  
Assistant City Attorneys  
City of Columbus, Department of Law  
Zach Klein, City Attorney  
77 North Front Street  
Columbus, Ohio 43215  
admmiller@columbus.gov  
tjmangan@columbus.gov  
wmphillips@columbus.gov

Elizabeth I. Cooke  
Kimberly P. Jordan  
OHIO STATE UNIVERSITY  
MORITZ COLLEGE OF LAW  
55 West 12th Avenue  
Columbus, Ohio 43210  
cooke.62@osu.edu  
jordan.723@osu.edu

Sean L. Walton  
Chanda L. Brown  
WALTON + BROWN, LLP  
395 E. Broad Street, Suite 200  
Columbus, Ohio 43215  
swalton@waltonbrownlaw.com  
cbrown@waltonbrownlaw.com

Alycia N. Broz  
Angelyne E. Lisinski  
Sarah Spector Boudouris  
P. Wilson Reiser  
Arryn K. Miner  
VORYS, SATER, SEYMOUR AND PEASE LLP  
52 East Gay Street, P. O. Box 1008  
Columbus, Ohio 43216  
anbroz@vorys.com  
aelisinski@vorys.com  
ssboudouris@vorys.com  
pwresier@vorys.com  
akminer@vorys.com

The undersigned hereby certifies that a true and accurate copy of the foregoing  
was served this 11th day of September, 2019 via regular U.S. Mail, postage prepaid, upon  
the following:

Demetrius Braxton  
Inmate #A731130  
Southern Ohio Correctional Facility  
1724 OH-728  
Lucasville, Ohio 45699

**/s/ Jonathan P. Misny**  
Jonathan P. Misny (0090673)

**VERIFICATION**

STATE OF Ohio )  
COUNTY OF Franklin ) ss:

I, Jaronn Collins, hereby swear and affirm that the foregoing responses to Defendant Bryan Mason's Requests for Admission are true and accurate to the best of my knowledge and belief.

Further affiant sayeth naught.

Jaronn Collins  
Jaronn Collins

Sworn to before me and subscribed in my presence this 11<sup>th</sup> day of September, 2019.

Jonathan P. Misny  
Notary Public



JONATHAN P. MISNY  
Attorney At Law  
Notary Public, State of Ohio  
My commission has no expiration date  
Sec. 147.03 R.C.